

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	Case No. 1:20-CR-143
v.	)	
	)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,	)	
	)	
<i>Defendant.</i>	)	
_____	)	

**MOTION TO SEAL GOVERNMENT’S MOTION TO EXCLUDE EVIDENCE AT  
TRIAL OR, IN THE ALTERNATIVE, TO CONTINUE THE TRIAL**

The United States of America, by and through its undersigned counsel and pursuant to Local Criminal Rule 49(C) and 49(E), moves to file under seal an un-redacted version of the government’s motion to exclude evidence at trial or, in the alternative, to continue the trial, and the exhibits attached thereto. Dkt. No. 371. An un-redacted copy will be delivered to the clerk’s office with a copy of this motion and provided to opposing counsel. A proposed Order is attached for the consideration of the Court.

The government’s filing responds to concerns regarding the defendant’s health, as well as material covered by the Protective Order in this matter. Sealing is necessary to safeguard the privacy of the defendant and his medical information, as well as this sensitive discovery material. Counsel for the government has considered procedures other than sealing and none will suffice to protect this information from disclosure.

The Court has supervisory power over its own records and may, in its discretion, seal documents if the public’s right of access is outweighed by competing interests. *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984). Such sealing is within the discretion of this Court and



## CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/  
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